

## REMARKS

Claims 1-24 are pending in this application. For convenience, Applicant has included a listing of the claims. No new amendments are made to the claims by this response. In the Office Action, all claims are rejected as allegedly being anticipated by multiple newly cited references. Reconsideration of each of the rejections is respectfully requested in view of the following remarks.

The Office rejects claims 1-24 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,104,815 (Alcorn et al.). Applicant respectfully submits that this rejection is defective because Alcorn et al. fails to teach each and every feature of the claims as required by 35 U.S.C. § 102.

In particular, Alcorn et al. does not teach, *inter alia*, an identifier that includes location and time information as in the claimed invention. In support of its rejection, the Office apparently cites FIG. 3 of Alcorn et al. as allegedly disclosing the claimed identifier. However, interpreting Alcorn et al. in a light most favorable to the Office's position only for purposes of this response, FIG. 3 of Alcorn et al. clearly shows use of a "PIN" as an identifier. Information such as latitude, longitude, and/or time can be included in one or more separate fields apart from the PIN. This is supported by the express language of the specification of Alcorn et al. See, for example, col. 3, lines 61-64; col. 9, lines 24-25; col. 10, lines 18-26; and col. 11, lines 16-17. As a result, Alcorn et al. fails to disclose use of location and time information as an identifier. Consequently, Applicant respectfully requests withdrawal of this rejection.

The Office alternatively rejects claims 1-24 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,552,682 (Fan). Applicant respectfully submits that this rejection

is similarly defective because Fan fails to teach each and every feature of the claims as required by 35 U.S.C. § 102.

In particular, Fan does not teach, *inter alia*, an object identifier that includes location and time information as in the claimed invention. In support of its rejection, the Office cites various portions of Fan that discuss GPS position, latitude and longitude information, time information, and identification information. However, Applicant notes that each of these locations either alone or in combination fails to disclose use of location and time information in an object identifier as in the claimed invention.

Turning first to the cited portions of Fan that discuss GPS position and interpreting Fan in a light most favorable to the Office's position only for purposes of this response, Applicant notes that the cited portions fail to disclose use of location and time information in an object identifier. In particular, the cited portions are limited to discussing GPS position. As a result, the cited portions cannot disclose use of time information in addition to location information as in the claimed invention. In Applicant's claimed invention, inclusion of the time and location information, among other things, helps assure that unique identifiers are generated. For example, two different objects could be located in the same location at different times. Without including time information, two identical identifiers are generated. This does not matter in Fan since the location information is only used to authenticate the location of an individual. In sharp contrast, the claimed invention generates a unique identifier using time and location information.

The remaining portions of Fan cited by the Office fail to address this deficiency. In fact, the remainder of Fan expressly includes location and/or time information apart from an identifier. For example, FIG. 7 and the corresponding discussion in col. 4, lines 57-67, expressly shows

table entries that include identifier, time, latitude, and longitude fields. Similarly, FIGS. 8 and 9 show table entries that include both an identifier field (ID and Area, respectively) and time fields. The inclusion of fields for time, latitude, and/or longitude apart from an identifier field at least inherently discloses that each of the respective identifier fields does not include this information.

In fact, inclusion of an identifier apart from location and time information in Fan is inherently necessary for its primary purpose of tracking the location of a mobile unit over time. In Fan, if the mobile unit were only identified by location, there would be no mechanism for associating previous locations of the mobile unit with its current location since the identifiers for each entry would be unique from one another. As a result, Fan fails to disclose an identifier that includes both location and time information. Consequently, Applicant respectfully requests withdrawal of this rejection.

Further, the Office also rejects claims 1-8 and 19-24 under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 5,629,981 (Nerlikar). Applicant respectfully submits that this rejection is similarly defective because Nerlikar fails to teach each and every feature of the claims as required by 35 U.S.C. § 102.

As with several references that the Office has cited as allegedly disclosing the claimed invention, Nerlikar fails to disclose, *inter alia*, an identifier that includes location and time information as in the claimed invention. In support of its rejection, the Office primarily relies on col. 4, lines 31-51 of Nerlikar as allegedly disclosing this feature of the claimed invention. Interpreting Nerlikar in a light most favorable to the Office's position only for the purposes of this response, Applicant notes that, as expressly stated in this portion of Nerlikar, time and location information are distinct from and stored apart from any identification data.

For example, Nerlikar discloses that a radio frequency identification transponder (RFID means) may include “the authorized user identification code, information destination, transaction location, time/date, configuration control, and secondary biological user(s) identification.” Col. 4, lines 48-51. Similarly, col. 7, line 59- col. 8, line 14 discusses separately storing date/time/location stamp information apart from a user ID. These portions of Nerlikar, cited by the Office in support of its rejection, clearly describe storing location and time/date information apart from user identification information. This interpretation is further evidenced by FIG. 4 of Nerlikar and the corresponding discussion in col. 8, lines 15-22, in which time, date and location information is clearly stored apart from “the ID number(s) of the user(s), [and] the destination or recipient IDs.” In sharp contrast, Applicant’s claimed invention includes time and location information in a unique identifier. As a result, Applicant respectfully requests withdrawal of this rejection.

Applicant respectfully submits that several additional claimed features of claims 1-24 are also not disclosed by Alcorn et al., Fan, and/or Nerlikar. For example, in each of the rejections, the Office alleges that “[t]he identifier is in a format suitable for tagging a network login.” However, the Office fails to cite any portion of any reference that allegedly discloses identifying a network login using an identifier that includes time and location information, let alone processing simultaneous network logins that occur at a common location. As a result, Applicant respectfully requests withdrawal of this rejection, or in the alternative, that the Office provide evidence in support of this rejection.

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

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